

AR201-13713



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April 17, 2002

Christine Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Re: EPA Comments on the Test Plan and Robust Data Summary for HFC-152a (CAS No.75-37-6)

Dear Administrator Whitman:

We received EPA's comments on DuPont's test plan and robust data summary for the chemical HFC-152a (CAS No.75-37-6) and are pleased to respond. We have considered the recommended revisions to the environmental fate, health effects, and ecological effects sections and EPA's specific comments on the robust data summaries, and we have revised our submittal as noted on the attached summary sheet. The revised robust data summary is also attached to this submittal.

If you have any questions about our response, please contact:

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Sincerely,

Edwin L. Mongan III
Manager, Environmental Stewardship
DuPont Safety, Health, & Environment Excellence Center

ELM:ria
Attachments

CC: Charlie Auer

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Summary of DuPont Response to EPA Comments on the Robust Data Summary and Test Plan for HFC-152a (CAS No.75-37-6)

Physical Chemical and Environmental Fate Data:

EPA comment: If “further evaluation” for biodegradation testing means undertaking testing for biodegradation, EPA agrees with this plan.

Response: Upon further evaluation, biodegradation testing is not believed to be necessary. The summary section of the robust summary was revised. Biodegradation results for an analog chemical were added to the robust summary.

Health Effects

EPA comment: Some studies were not GLP-compliant and in most robust summaries the specific guideline followed was not indicated. Also, repeated-dose and genetic toxicity studies did not indicate the statistical method, and the repeated-dose study did not indicate the number of animals per dose group that displayed the observed signs of toxicity.

Response: Where available, data were added to address the missing information.

Ecological Effects

EPA comment: Submitter needs to provide robust summaries for the analog chemicals used in the ECOSAR models. In the case of algae, the submitter needs to provide an analog to support the SAR-predicted endpoint.

Response: Requested data were added to the robust summary.